

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

Allison M. Brown, Esq.
One Manhattan West
New York, New York 10001
Telephone: (212) 735-3222
Facsimile: (917) 777-3222
Email: Allison.Brown@skadden.com

PROPOSED SPECIAL COUNSEL FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Hon. Michael B. Kaplan

**NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF NOTICES
AND DOCUMENTS, AND REQUEST FOR ADDITION TO MATRIX**

PLEASE TAKE NOTICE that pursuant to section 1109 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, LTL Management LLC, the above-captioned Debtor, appears through its proposed special counsel, Skadden, Arps, Slate, Meagher & Flom LLP, and requests service of all notices and documents herein upon:

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

Allison M. Brown, Esq.
One Manhattan West
New York, New York 10001
Telephone: (212) 735-3222
Facsimile: (917) 777-3222

Counsel also requests that all ECF/electronic notices be sent to Allison.Brown@skadden.com.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

PLEASE TAKE FURTHER NOTICE that the foregoing request for service includes all pleadings of any kind, including, without limitation, all notices, applications, motions, complaints, and orders, whether written or oral, formal or informal, however transmitted or conveyed, related in any way to the above-captioned Debtor, its property, or its estate.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance, Request for Service of Notices and Documents, and Request for Addition to Matrix* (the “Notice”) nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in noncore matters entered only after *de novo* review by a District Judge, (ii) the right to trial by jury in any proceeding triable in these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (v) an election of remedies, or (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 10, 2023

Respectfully submitted,

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

/s/ Allison M. Brown

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New York, NY 10001
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Proposed Special Counsel for LTL Management LLC